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Attorneys for GUARANTORS/DEFENDANTS/COUNTER-PLAINTIFFS/CROSS-PLAINTIFFS

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

BP WEST COAST PRODUCTS, LLC, Plaintiff and Counter Defendant, v. CROSSROAD PETROLEUM., a California corporation; Guarantors/Defendants/Counter-Plaintiffs/Cross-Plaintiffs	Case No.: 12CV00665 JLS (JLB) *Lead Case* [Consolidated with Case Nos. 12cv886 JLS(JLB), 12cv887 JLS(JLB) and 12cv888 JLS(JLB) Honorable Jill Burkhardt **OSC RESPONSE**

COMES NOW PAMELA G. LACEY and DAVID SCHILLER, as counsel for certain SCHILLER DEFENDANTS, and, as a Response to the Court's OSC issued on June 14, 2016, offers the following explanation of nonappearance of certain individuals named in the OSC.

1. The Court's Order specified that only the named parties were ordered to personally appear at the Mandatory Settlement Conference. Accordingly, the principals of the named parties were in attendance, in keeping with the Court's Order of February 22, 2015. The following named individuals were guarantors only and not Franchisees or principals of the named parties.

Alvandi, Natalie
Arora, Rajesh
Haddadin, Sylvia
Hassounch, Basel
Kaskas, Tahssen
Kianmahd, Behzad
Maaytah, Ammar
Maaytah, Randa
Natt, Anit
Quasqas, Muna
Sahih, Nader
Sharma, Ruchira
Shilleh, Hamza
Wang, Kotsai
Zomorodian, Rebecca

2. Of these listed, many settled, including the Maaytahs and Kotsai Wang for Southland Petroleum (which entity is listed as "failed to appear"), Quasqas for Pacific Expotech, and Sylvia Haddadin for Crestview Consolidated. Thus, it is requested that the OSC as to these individuals and Southland Petroleum be dismissed for failure to appear. As for the balance listed, many were "represented" by others in attendance, with the Court's knowledge and understanding.

3. Counsel are informed and believe that good faith negotiations are ongoing as to The Shomers Group, with Bahman Kianmahd representing all concerned interests, including those of Behzad Kianmahd, whose appearance as a guarantor only should be excused. As to Anit Natt, Gagan Natt, if called to testify, would state that Magistrate Burkhardt agreed that it was acceptable for him to appear on his wife's behalf at the hearing. As to Basel Hassounch, Rafael Castillo informed the Court at the hearing that Mr. Hassounch had not been a named business partner in BHRC Petroleum for several years, thus, his name should not have been included as affiliated with this business. Andre Golnazarian (Perfect Fuel) appeared for his father, Razmik, with a note from his father's doctor regarding his ill health and inability to travel and explained to Magistrate Burkhardt why his mother, who has been battling colon cancer, was

also unable to attend due to her ill health. (See Declaration of RAZMIK GOLNAZARIAN attached). Thus, these 15 named individuals, as well as Southland Petroleum, Inc., should have the OSC against them vacated.

4. Of the remaining 16 identified "no shows", declarations are being submitted herewith, by way of explanation to the Court, of the reasons for failure by these individuals/companies to appear. Specifically, attached hereto are OSC Declarations for the following:

PAUL BASKARON, PB, INC.
DAVID PARKER, CHASE PRODUCTS
GOLNAZARIAN, RAZMIK AND MARET
HIMANSHU SARVAIY, RASNA, LLC
ILIANA MONTEAGUDO, MONTEAGUDO ENTERPRISE, INC.
PARSHOTAM KAMBOJ

These declarations represent 9 of the named parties on the list, and have specified reasons why they did not appear at the Settlement Conference. It is respectfully requested that the Court dismiss any outstanding OSC against each of these, based on the declarations provided.

5. As for the remaining 7:

ALVANDI, FRANCOIS
GHALLAB BROTHERS, INC.
GHALLAB, IBRAHIM
KISHAN, KALUR
RUCHISYS, INC.
ZORENKELIAN, MARIE
ZORENKELIAN, TOROS

and as set forth in the attached Declaration of Pamela G. Lacey, TOROS ZORENKELIAN advised that he told Mr. Schiller a while back that he did not want to be part of this litigation and was told that it wasn't his choice, and he was offered a declaration to sign, but he failed to respond further. Mr. KISHAN for RUCHISYS, INC., advised that he was getting some paperwork into counsel, but failed to follow up.

6. As for the remaining missing parties, all attempts to reach IBRAHIM GHALLAB, GHALLAB BROTHERS, INC., and FRANCOIS ALVANDI (whose interests were represented by others in attendance) have been futile. Telephone calls to the last known phone number for GHALLAB revealed a disconnected number and MR. ALVANDI has not returned any calls from messages left. Emails have been sent to all parties listed who failed to appear on multiple occasions. Defense counsel has reached out to other clients to determine whether anyone else knows of a best way to reach these individuals, without success.

7. In April, Defense counsel attempted to coordinate representatives to appear for the group and in speaking with BP counsel, Abby Risner, reached a tentative arrangement that, if signed Proxies were presented at the hearing, in lieu of ALL of the parties attending, it would make it a more streamlined process

and enable the Court to move the hearing more efficiently. Attorney Schiller sent a letter to the Court to use a "committee" for representation at the hearing, which was denied, as being improperly presented.

8. Due to the extremely large group of parties represented, it was impossible to gather information from each individual party as to whether they could or could not appear in order to request permission, in advance, to be excused from attendance, as per the Court's February 22, 2016 Order. All parties were notified shortly after the Order was issued, that their attendance was mandatory with follow-up emails sent. In light of the significant number of attendees at the hearing, it is respectfully requested that that Court take notice that the communications were effective and that the majority of the parties did attend. As for the remainder, the explanations have been provided within this Response and/or the Declarations attached. Accordingly, it is respectfully requested that no sanctions issue against the parties referenced herein which have made a good faith showing as to their failure or inability to attend the June 8, 2016 hearing.

RESPECTFULLY SUBMITTED:

Dated: July 7, 2016 **LACEY LAW**

By: /s/ Pamela G. Lacey
Pamela G. Lacey
Attorney for Guarantors/Dealer
Defendants and

Counter-Plaintiffs

Dated: July 7, 2016

THE SCHILLER LAW GROUP, PLLC

By: __/s/ David A. Schiller____________
David A. Schiller, Esq.
Attorney for Guarantors/Dealer
Defendants and
Counter-Plaintiffs

PROOF OF SERVICE BY MAIL
(C.C.P. Section 1013a(3))

UNITED STATES DISTRICT COURT)
) BP West Coast v. Crossroad
) Petroleum, Inc., et al
SOUTHERN DISTRICT)
OF CALIFORNIA) Case 3:12-cv-00665-JLS(JLB)

I am over the age of 18, and not a party to the within action. I am employed by The Schiller Law Group, PLLC, a professional limited liability corporation, in the county of Collins, at P O Box 863658, Plano, Texas 75086.

On July 7, 2016, I served the attached:

NAMED GUARANTORS/ DEALER RESPONSE TO OSC

SEE ATTACHED MAILING LIST

[ ] (BY MAIL) I deposited such envelope via U.S. Postal Service in Plano, Texas The envelope was mailed with postage thereon fully prepaid.

[x] (BY E-FILING)(USDC) I caused such document to be sent electronically to the court; electronic filing constitutes service upon the parties who have consented to electronic service.

[ ] (BY EMAIL) I sent this document via email as listed on the mailing list attached, on __/____/16

[ ] (BY PERSONAL SERVICE) Such envelope was delivered by _ and handed to the addressee(s) on ____________________

[ ] (STATE) I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

[ ] (FEDERAL) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Executed on July 7, 2016 at Garland, TX.

___/s/ Chirlyn Scroggins______
Chirlyn Scroggins

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ATTORNEYS FOR SOME GUARANTORS/DEFENDANTS/COUNTER-PLAINTIFFS/CROSS-PLAINTIFFS

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

BP WEST COAST PRODUCTS LLC, Plaintiff and Counter Defendant **v.** **CROSSROAD PETROLEUM INC, et al Guarantors/Defendants/Counter-Plaintiffs/Cross-Plaintiffs**	**3:12-cv-00665-JLS (JLB)** ***Lead Case*** **[Consolidated with Case Nos. 12cv886 JLS(JLB, 12cv887 JLS(JLB) and 12cv888 JLS(JLB)** **HON. JANIS L. SAMMARTINO** **NAMED GUARANTORS/ DEALER DEFENDANTS' DECLARATION OF DAVID SCHILLER IN COMPLIANCE**

	WITH THE SHOW CAUSE ORDER OF THE COURT

TO THE HONORABLE JUDGE OF SAID COURT:

DECLARATION OF DAVID SCHILLER

I, DAVID SCHILLER, declare under penalty of perjury as follows:

I am competent to make this declaration and have personal knowledge of the facts contained herein by virtue of my personal involvement in representing Defendants.

1. I have been licensed to practice law for over 19 years.

2. This case was set for a Settlement Conference before the Court on June 6, 2016.

3. As ordered, each client represented by the undersigned was contacted by email, on multiple occasions, to notify them that their attendance at the Settlement Conference was required.

4. Not only the undersigned contacted the clients, but Pam Lacey also contacted the clients, by email and by phone.

5. The Committee Members also made contact with the clients to be sure that everyone was aware of the settlement conference and that their presence was required.

6. The clients were also requested to be sure the guarantors named in their behalf were in attendance.

7. The undersigned sent multiple emails to the Parties and committee members advising with more than a half dozen between June 1-June 6th reminding everyone of the settlement conference, asking all parties to reach out to each other and requesting that the Parties confirm their attendance at the settlement conference. The undersigned asked committee members to reach out to all parties to remind them of the mandatory nature of the attendance. The undersigned told all named parties by email that if they were married that their spouses would need to attend the settlement conference because they were most likely guarantors.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

/s/ David Schiller

DAVID SCHILLER
Executed on July 7, 2016

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UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

BP WEST COAST PRODUCTS, LLC, Plaintiff and Counter Defendant, v. CROSSROAD PETROLEUM., a California corporation; Guarantors/Defendants/Counter-Plaintiffs/Cross-Plaintiffs v.	Case No.: 12CV00665 JLS (JLB) *Lead Case* [Consolidated with Case Nos. 12cv886 JLS(JLB), 12cv887 JLS(JLB) and 12cv888 JLS(JLB) Honorable Jill Burkhardt **OSC DECLARATION OF COUNSEL**

I, PAMELA G. LACEY, am an attorney licensed to practice law in all courts in the State of California, and am co-counsel with DAVID SCHILLER for the Defendants/Cross-Complainants in this case. I submit this Declaration in Opposition to the Court's Order to Show Cause regarding certain of our clients' failure to appear at the Court ordered Mandatory Settlement Conference in this matter. The following information is personally known to me to be true and if called to testify, I could and would testify competently to the facts contained herein.

It was my belief and understanding that the Court's Order of February 22, 2016, required only that the principal of each defendant entity appear in person, not that all of the guarantors were required to attend. The Order stated, "Personal Appearance of Parties Required: All parties, adjusters for insured defendants, and other representatives of a party having full settlement authority as explained below, and the principal attorneys responsible for the litigation, must be present in person and legally and factually prepared to discuss settlement of the case." I have been in practice over 32 years and have attended hundreds of settlement conferences. I reasonably believed that the emails which I sent to our clients sufficiently notified them of the requirement that the principal of their company and/or the named individual MUST attend the hearing. I apologize to the Court and opposing counsel for any misunderstanding on my part that we were also required to present all guarantors at the hearing. I am informed and believe that the persons in attendance had full settlement authority and could speak for all guarantors. Thus, it was my belief that we had complied with the Court's Order.

Attached hereto are true and correct copies of Declarations from the following, explaining their failure to appear at the hearing:

PAUL BASKARON, PB, INC.

DAVID PARKER, CHASE PRODUCTS

RAZMIK GOLNAZARIAN

HIMANSHU SARVAIY, RASNA, LLC

ILIANA MONTEAGUDO, MONTEAGUDO ENTERPRISE, INC.

PARSHOTAM KAMBOJ

As to Anit Natt, Gagan Natt, if called to testify, would state that Magistrate Burkhardt agreed that it was acceptable for him to appear on his wife's behalf at the hearing. As to Basel Hassounch, Rafael Castillo informed the Court, in my presence at the hearing, that Mr. Hassounch had not been a named business partner in BHRC Petroleum for several years, thus, his name should not have been included as affiliated with this business. Thus, while declarations have not been presented for these individuals, it was reasonably believed that the Court had accepted their explanations of "failure to appear" at the time of the hearing. It would also seem that to the extent that the parties, despite certain absences, were able to settle their cases with BP, and/or are engaged in further discussions, such as The Shomers Group, that those individuals should not be subject to sanctions.

Following several emails to our clients, I was finally able to speak with Toros Zorenkelian last week, who advised me that he previously told Mr. Schiller that he didn't want to be involved in this action. I explained to him that it wasn't his choice, that he was a named defendant and had to participate or sanctions would be issued against him. I told him that I could prepare a declaration for him to sign and submit to the Court, he repeated that he did not want to be involved in the litigation.

I also spoke with Kalur Kishan last week, after leaving several messages. He advised that he was getting paperwork together for me regarding Ruchisys, Inc. and would email it to me. On the date of signing this Declaration, I received an email from Sai Kalur, advising that he, too, did not want to be involved in the case, which he advised Mr. Schiller, but that the emails regarding the mandatory appearance must have gone to his spam email, as he didn't recall having received them. I told them that his Declaration would be necessary but have not heard further.

I have left telephone messages for Francois Alvandi, but have received no return calls or response to my email messages. I have contacted the only phone number we have for Ghallab Brothers, Inc., however, the number has been disconnected. I did an internet search for Mr. Ghallab and there is one on Facebook, however, I do not belong to that group for contact, nor do I know if that was him. I sent emails to several other clients to see if anyone else knew of current contact information for the Ghallabs, to no avail. I also obtained ALL contact information on all of the clients from Mr. Schiller's assistant in Texas, Chirlyn Scroggins.

I am aware of MR. SCHILLER'S efforts to seek Court approval, informally, of having a committee appear at the Settlement Conference in order to streamline the process, which efforts failed. Accordingly, on April 22, 2016, I emailed Abby Risner, counsel for BP, and asked her if we could stipulate to using signed Proxies for attendance so that a select group of dealers would appear, representing the entire group. We also discussed her concern that the first conference with the Crossroads Defendants would not take the whole day but that she wanted to make sure that the Pacific Expotech defendants appeared in person. It was at my suggestion that we use the afternoon of June 6th to address the Pacific Expotech case, that an agreement was reached and Stipulation circulated. While Ms. Risner agreed, in principal, to the Proxy idea, it was ultimately dropped due to the Court's requirement of a formal motion and hearing for relief from attendance. However, I prepared Proxies and sent them to all of our clients, 20 or so of which were signed and returned. In my limited experience with this group, we rarely get full cooperation or response, even for meetings with counsel.

Given that the parties which returned signed Proxies also appeared at the hearing on June 8, 2016, I cannot say that they were confused and did not believe that they did not need to attend, although I apologize to the Court and counsel for any confusion which my conduct may have caused. I was simply trying to simplify and expedite the process for the Court, knowing that we could not begin to file requests for nonattendance for the numbers of parties involved, under the circumstances.

As to Defendants Aly Shakankiry, Bahman Kianmahd, Denise M. Brown, and Younes Dobli Bennani, I am informed and believe that they were all traveling to the San Diego Court from north of Los Angeles and failed to adequately plan for the heavy traffic in north San Diego county, thus, their travel time took them much longer than anticipated. Given the good faith participation and serious negotiations of these individuals, on behalf of their clients, for the entire day and well into the night, it is respectfully requested that the sanctions be waived.

The Court's OSC was sent, via email, to the 4 individuals and only Mr. Shakankiry formally responded. I am also informed and believe that Denise M. Brown has a serious medical condition and was to have treatment on the June 6th date, but was able to change the date and called your declarant to leave a voicemail message on the morning of June 6th, advising that she was running late and to advise the Court that she was on her way. I also know that Bahman Kianmahd, was personally negotiating with BP and their counsel and representative on behalf of The Shomers Group and may have since settled his cases, and believed that his further response was unnecessary. As to Mr. Shakankiry and Mr. Bennani, I believe that both are guarantors and/or officers of Southland Petroleum, Inc., which entity settled at the hearing.

Therefore, it is respectfully requested that the Court dismiss its OSC against counsel herein and waive any pending sanctions.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 7th day of July, 2016, at Tustin, California.

/s/ Pamela G. Lacey
PAMELA G. LACEY

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UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

BP WEST COAST PRODUCTS, LLC, Plaintiff and Counter Defendant, v. CROSSROAD PETROLEUM., a California corporation; Guarantors/Defendants/Counter-Plaintiffs/Cross-Plaintiffs v.	Case No.: 12CV00665 JLS (JLB) *Lead Case* [Consolidated with Case Nos. 12cv886 JLS(JLB), 12cv887 JLS(JLB) and 12cv888 JLS(JLB) Honorable Jill Burkhardt **OSC DECLARATION**

I, RAZMIK GOLNAZARIAN, am the principal of PERFECT FUEL, INC., a defendant/cross-complainant in this case, and hereby submit this Declaration in Opposition to the Court's Order to Show Cause regarding my failure to appear at the Court ordered Mandatory Settlement Conference in this matter. The following

information is personally known to me to be true and if called to testify, I could and would testify competently to the facts contained herein.

I have been very ill for the last year and had my son, ANDRE GOLNAZARIAN, attend in my place, for me and my wife, MARET, who has suffered with colon cancer for 2 years now. I sent a doctor's note with my son to show the judge, which I am informed was accepted. I was disturbed to learn that I was still "guilty" and subject to an OSC, given my efforts to protect my company's interests in this matter.

My son, ANDRE, has been intimately involved with the management and operation of PERFECT FUEL, INC. He is just as qualified to make decisions on behalf of this entity as anyone. My wife knows nothing about the business but signed a personal guarantee only.

I apologize to the Court for my failure to appear, but I was physically unable to travel and attend the hearing. I further apologize to the Court for not seeking prior approval. Please accept my son's attendance at the Mandatory Settlement Conference in lieu of mine and my wife's, and dismiss any pending OSC against me and my wife.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 28 day of June, 2016, at Glendale, California.

By: [signature]

RAZMIK GOLNAZARIAN

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UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

BP WEST COAST PRODUCTS, LLC, Plaintiff and Counter Defendant, v. CROSSROAD PETROLEUM., a California corporation; Guarantors/Defendants/Counter-Plaintiffs/Cross-Plaintiffs v.	Case No.: 12CV00665 JLS (JLB) *Lead Case* [Consolidated with Case Nos. 12cv886 JLS(JLB), 12cv887 JLS(JLB) and 12cv888 JLS(JLB) Honorable Jill Burkhardt **OSC DECLARATION**

I, PARSHOTAM KAMBOJ, a defendant/cross-complainant in this case, hereby submit this Declaration in Opposition to the Court's Order to Show Cause regarding my failure to appear at the Court ordered Mandatory Settlement Conference in this matter. The following information is personally known to me to be true and if called to testify, I could and would testify competently to the facts contained herein.

I first learned of the Settlement Conference from DENISE BROWN, another dealer, after the fact. At no time did I receive an email from either Pamela G. Lacey or David Schiller notifying me of the hearing. I went back and checked all of my emails on the address used, including the spam mail, but could not find any such notice. I admit that I am not actively involved in oversight of this case and thought it had been dismissed.

I am truly sorry to the Court for any delay or expense caused by my absence and am absolutely interested in participating in any future hearings. I promise that I will keep my attorneys informed of any extended absences by me from the area or changes to my contact information so that nothing like this occurs in the future.

Please forgive my unexcused attendance at the Mandatory Settlement Conference and dismiss any pending OSC against me.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 28 day of June, 2016, at PASADENA, California.

[signature]

By: PARSHOTAM S. KAMBOJ

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UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

BP WEST COAST PRODUCTS, LLC, Plaintiff and Counter Defendant, v. CROSSROAD PETROLEUM., a California corporation; Guarantors/Defendants/Counter-Plaintiffs/Cross-Plaintiffs v.	Case No.: 12CV00665 JLS (JLB) *Lead Case* [Consolidated with Case Nos. 12cv886 JLS(JLB), 12cv887 JLS(JLB) and 12cv888 JLS(JLB) Honorable Jill Burkhardt **OSC DECLARATION**

I, HIMANSHU SARVAIY, am the principal of RASNA, LLC, a defendant/cross-complainant in this case, and hereby submit this Declaration in Opposition to the Court's Order to Show Cause regarding my failure to appear at the Court ordered Mandatory Settlement Conference in this matter. The following

information is personally known to me to be true and if called to testify, I could and would testify competently to the facts contained herein.

I manage several properties, one of which sustained a fire on June 8, 2016, thus requiring me to attend to this emergency situation. I had full intentions of attending the Court hearing but it was impossible for me to do so as I had to go to the property and access everything to assist the fire crews and manage the property. Accordingly, I asked my cousin, Axay Sayani, to appear on my behalf as he is familiar with the business and the case. He was in telephone communication with me, as much as possible, throughout the day.

I am truly sorry to the Court for any delay or expense caused by my absence and take my attendance at these hearings very seriously. Please forgive my unexcused attendance at the Mandatory Settlement Conference and dismiss any pending OSC against me.

I declare under penalty of perjury that the foregoing is true and correct. Executed this _24___ day of June, 2016, at _Brea________, California.

[signature]

By:_Himanshu Sarvaiya__

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UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

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I, PAUL BASKARON, am principal of PB, INC., aka Paul's Arco, a defendant/cross-complainant in this case, and hereby submit this Declaration in Opposition to the Court's Order to Show Cause regarding my failure to appear at the Court ordered Mandatory Settlement Conference in this matter. The following

information is personally known to me to be true and if called to testify, I could and would testify competently to the facts contained herein.

I first learned of the Settlement Conference from my nephew after the fact. At no time did I receive an email from either Pamela G. Lacey or David Schiller notifying me of the hearing. I went back and checked all of my emails on the address used, including the spam mail, but could not find any such notice. I admit that the email address I had given to my lawyers is a lesser used address by me.

I am located in San Diego and could easily have attended the Settlement Conference. I am truly sorry to the Court for any delay or expense caused by my absence and am absolutely interested in participating in any future hearings. I promise that I will keep my attorneys informed of any extended absences by me from the area or changes to my contact information so that nothing like this occurs in the future.

Please forgive my unexcused attendance at the Mandatory Settlement Conference and dismiss any pending OSC against me.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 24 day of June, 2016, at Escondido, California.

By: PAUL BASKARON

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UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

BP WEST COAST PRODUCTS, LLC, Plaintiff and Counter Defendant, v. d ROSSROAD PETRO7EUM., a d alifornia corporation; Guarantors/Defendants/d ounter-Plaintiffs/d ross-Plaintiffs v.	d ase No.: 12d V00665 J7S (J7B) *Lead Case* [d onsolidated with d ase Nos. 12cv886 J7S(J7B), 12cv887 J7S(J7B) and 12cv888 J7S(J7B) Honorable Jill Burkhardt **OSC DECLARATION**

I, DAVID PARKER, am the President of CHASE PRODUCTS, INC., a California corporation, a defendant/cross-complainant in this case, and hereby submit this Declaration in Opposition to the Court's Order to Show Cause regarding my failure to appear at the Court ordered Mandatory Settlement Conference in this matter. The following information is personally known to me to be true and if called to testify, I could and would testify competently to the facts contained herein.

I first learned of the Settlement Conference and the Order to Show Cause after the fact. At no time did I receive an email from either Pamela G. Lacey or David Schiller notifying me of the hearing. I had changed my email address a while back and forgot to advise the attorneys of this change. A former business partner of mine, Dan Bauman, was more involved in this business than I was, but left more than one year ago.

I am truly sorry to the Court for any delay or expense caused by my absence and am absolutely interested in participating in any future hearings. I promise that I will keep my attorneys informed of any extended absences by me from the area or changes to my contact information so that nothing like this occurs in the future.

Please forgive my unexcused attendance at the Mandatory Settlement Conference and dismiss any pending OSC against me.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 24th day of June, 2016, at Los Angeles, California.

DAVID PARKER

By: [signature]

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UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

BP WEST COAST PRODUCTS, LLC, Plaintiff and Counter Defendant, v. CROSSROAD PETROLEUM., a California corporation; Guarantors/Defendants/Counter-Plaintiffs/Cross-Plaintiffs v.	Case No.: 12CV00665 JLS (JLB) *Lead Case* [Consolidated with Case Nos. 12cv886 JLS(JLB), 12cv887 JLS(JLB) and 12cv888 JLS(JLB) Honorable Jill Burkhardt **OSC DECLARATION**

I, ILIANA MONTEAGUDO, represent MONTEAGUDO ENTERPRISE, INC., a defendant/cross-complainant in this case, and hereby submit this Declaration in Opposition to the Court's Order to Show Cause regarding my failure to appear at the Court ordered Mandatory Settlement Conference in this matter. The following

information is personally known to me to be true and if called to testify, I could and would testify competently to the facts contained herein.

I live in Dallas, Texas, as a single mother with 2 kids. I could not afford to continue living in Southern California and moved here a while back. I could not afford to fly back to California and get a hotel to attend the hearing, with my children. I now live on food stamps and a small salary due to my employment as a cashier at a gas station. I had arranged for Issa Demes to represent my interests at the hearing as he is familiar with my former station and the issues in my case. I apologize that I did not request permission from the Court to do so in advance.

I am truly sorry to the Court for any delay or expense caused by my absence and am absolutely interested in participating in any future meaningful hearings. Please forgive my unexcused attendance at the Mandatory Settlement Conference and dismiss any pending OSC against me.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 27th day of June, 2016, at Dallas, Texas.

By: Iliana Monteagudo